

1 John P. Aldrich, Esq.
2 Nevada Bar No. 6877
3 Catherine Hernandez, Esq.
4 Nevada Bar No. 8410
5 **ALDRICH LAW FIRM, LTD.**
6 7866 West Sahara Avenue
7 Las Vegas, Nevada 89117
8 Tel: (702) 853-5490
9 Fax: (702) 227-1975
10 *Attorneys for Defendant*
11 *JD ROSS ENTERPRISES LLC dba*
12 *UNIQUE CUSTOM HOMES*

13 **UNITED STATES DISTRICT COURT**
14 **DISTRICT OF NEVADA**

15 KINSALE INSURANCE COMPANY,
16
17 Plaintiff

18 vs.

19 JD ROSS ENTERPRISES LLC dba UNIQUE
20 CUSTOM HOMES and FALCON CLIFF,
21 LLC,
22
23 Defendants

Case No.: 2:23-cv-01205-CDS-NJK

STIPULATION AND ORDER TO
EXTEND THE DEADLINE TO FILE
RESPONSE TO PLAINTIFF'S
MOTION FOR PARTIAL SUMMARY
JUDGMENT [ECF NO. 25]

(First Request)

24 IT IS HEREBY STIPULATED AND AGREED, by and between the parties, Plaintiff
25 KINSALE INSURANCE COMPANY ("Plaintiff"), by and through its attorney of record, Kelly
26 A. Hedberg, Esq., of Morales Fierro & Reeves and Defendant JD ROSS ENTERPRISES LLC dba
27 UNIQUE CUSTOM HOMES ("Defendant"), by and through its attorney of record, John P.
28 Aldrich, Esq., of the Aldrich Law firm, Ltd., as follows:

On June 7, 2024, Plaintiff filed a Motion for Partial Summary Judgment [ECF No. 25].
The current deadline to respond to this Motion is June 28, 2024.

Because of existing commitments and previously scheduled travel of Defendant's counsel,
the parties have agreed to extend the deadline for Defendant to file a Response to Plaintiff's Motion
for Partial Summary Judgment from June 28, 2024 to **July 12, 2024**.

This stipulation is submitted in good faith and not for purposes of delay. It is the first
request for an extension of this deadline in this case.

1 IT IS SO STIPULATED.

2 DATED this 25th day of June, 2024.

3 **ALDRICH LAW FIRM, LTD.**

4 /s/ John P. Aldrich

5 John P. Aldrich, Esq.

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13 *Attorneys for Defendant*

14 *JD ROSS ENTERPRISES LLC dba*

15 *UNIQUE CUSTOM HOMES*

DATED this 25th day of June, 2024.

MORALES FIERRO & REEVES

/s/ Kelly A. Hedberg

Kelly A. Hedberg, Esq.

Nevada Bar No. 12224

600 So. Tonopah Drive, Suite 300

Las Vegas, NV 89106

Telephone (702) 699-7822

Facsimile: (702) 699-9455

Attorneys for Plaintiff

12 **ORDER**

13 IT IS SO ORDERED:

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UNITED STATES DISTRICT JUDGE

17 Dated: June 27, 2024
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